

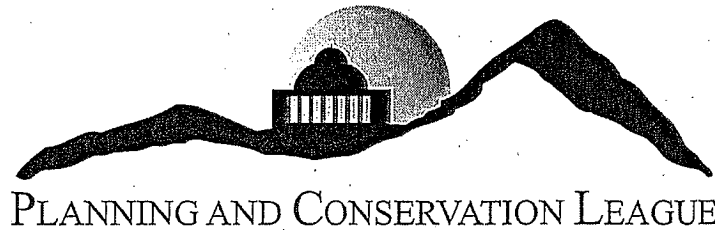
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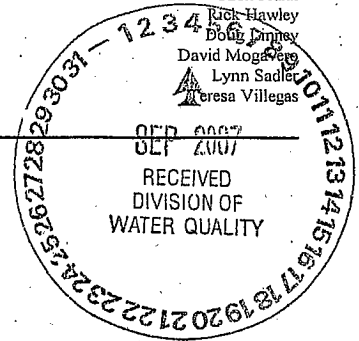
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September 4, 2007

Ryan Maughan, Division of Water Quality
State Water Resources Control Board
1001 I Street, 15th Floor
Sacramento, CA 95814

Re: Comment Letter – September 13, 2007 Irrigated Lands Program Joint Workshop

Dear State and Regional Water Board Members:

We appreciate the opportunity to provide public comments on the Central Valley's *Conditional Waiver Program for Irrigated Agriculture*. On behalf of the Planning and Conservation League, we urge you to revise this program so that the program achieves federal and state water quality law standards, protects the drinking water sources for communities dependent on groundwater, and reduces water quality impairments of the Sacramento/San-Joaquin Bay Delta and upstream watershed.

Ensure Transparency in Monitoring Program

The State Board has found that there have been exceedances of water quality objectives in surface water bodies within the Central Valley. Therefore, it is important that the monitoring and reporting component of this waiver program explicitly identify the point source from which contaminants are surpassing those objectives. The revised program should not only serve as an opportunity for Central Valley irrigators to reduce their contaminant loads in a collective manner, but for the Regional Board to have an acute sense of the level of agricultural byproducts in the state's water sources. To ensure this level of public disclosure, we urge that the revised program prioritize precision and transparency in the reporting process.

Improve Bay-Delta Water Quality

Scientists contributing to the Pelagic Fish Action Plan are confirming that high levels of exports from the California Bay-Delta and toxic contamination are contributing to the crash of key species in that ecosystem. Given the imperiled state of the Delta, the State Water Board should give strict scrutiny to the irrigated lands waiver program and its effectiveness in reducing contaminant load to the state's water sources.

In particular, the Department of Water Resources has identified in the San Joaquin Valley Drainage 2001 Drainage Report that 372,000 acres of San Joaquin Valley farmland as having severe drainage problems (characterized by 0 to 5 feet distance between surface and



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1107 9th Street, Suite 360, Sacramento, CA 95814 Phone: 916-444-8726 Fax: 916-448-1789

Website: www.pcl.org Email: pclmail@pcl.org

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groundwater table). The Central Valley Regional Control Board should consider this persistent environmental problem in the review of the irrigated lands program and its effect on the discharge of agricultural runoff in the San Joaquin Valley.

Restore Safe Drinking Water

Irrigation water run-off from fields contains a toxic mix of fertilizers and pesticides, which ultimately flow into our surface waterways and seeps into the state's groundwater aquifers, which rural San Joaquin Valley communities rely on for drinking water. As a result, currently over 20 percent of all community systems in Tulare County cannot meet basic safe drinking water laws, almost entirely due to nitrate contamination of groundwater sources.

Sincerely,

Charlotte Hodde
Water Policy Specialist
chodde@pcl.org